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T-448 P.002/004 F-634

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U.S. DISTRICT COURT E.D.N.Y.

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MAY 13, 2005

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**DOCKET & FILE**P.M. _____
TIME A.M. _____

Helen Nelson,

Court File No.: CV 03-6247 (DGT/ASC)

Plaintiff,

vs.

STIPULATION AND AGREED
PROTECTIVE ORDERUNUM Life Insurance Company of
America and Jostens, Inc.

Defendants.

The parties, through their undersigned counsel, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, stipulate and agree to the entry of the following order:

1. Any discovery document may be designated CONFIDENTIAL by, and in the sole discretion of, the party which prepared or produced the document.
2. Any document designated CONFIDENTIAL by a party, and all information and data contained therein, shall be treated by the other parties as confidential and shall not be used or disclosed outside of this action for any purpose whatsoever, and specifically shall not be used or disclosed for any business or commercial purpose.
3. Duplication of any document designated CONFIDENTIAL shall be done only as necessary.
4. All documents designated CONFIDENTIAL, and all duplicates thereof, shall be controlled by and remain in the possession of legal counsel representing the parties to this action. Documents designated CONFIDENTIAL, and duplicates thereof, shall be shown to clients, witnesses and potential witnesses, law firm staff, court reporters, and the Court and Court staff only as necessary to the prosecution of a claim or defense in this action, and shall not be shown

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to any other person. No copy of any document designated CONFIDENTIAL shall be provided or made available to clients, witnesses or potential witnesses.

5. No document designated CONFIDENTIAL shall be filed in the Court record or lodged with the Court until after notice of intent to file or use any such document is provided to the other parties to this action and advance approval of the Court is obtained. The Court, in its discretion, may order that documents designated CONFIDENTIAL be filed under seal.

6. Legal counsel are strictly charged to comply with this Order, and are placed on notice hereby that any violation of this Order shall be presumed to be the liability of legal counsel, subject to legal counsel's burden to rebut that presumption on order to show cause why an appropriate sanction should not issue.

**EISENBERG MARGOLIS FRIEDMAN
& MOSES**

Dated: 4/14/05

By: Harriette N. Boxer
Harriette N. Boxer (HB-9681)
275 Seventh Avenue
Suite 2300
New York, NY 10001
212-419-1522

ATTORNEYS FOR PLAINTIFF

**MCELROY, DEUTSCH, MULVANEY &
CARPENTER LLP**

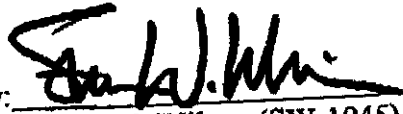
Dated: _____

By: _____
Louis P. DiGiamo (LPD-5784)
1300 Mount Kemble Ave., P.O. Box 2075
Morristown, NJ 07962-2075
(973) 993-8100

**ATTORNEYS FOR DEFENDANT
UNUM LIFE INSURANCE COMPANY
OF AMERICA**

Dated: 4-25-05

BRIGGS AND MORGAN, P.A.

By: 
Steven W. Wilson (SW-1045)
2200 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
612-977-8400

ATTORNEYS FOR DEFENDANT
JOSTENS, INC.

SO ORDERED:

IT IS SO ORDERED.

Dated: 4/26/05

s/Kiyo A. Matsumoto

Kiyo A. Matsumoto
Magistrate Judge